Project Level Evaluations for Former S&M Species

Overview

The State Director formally updated the SSS list for Oregon and Washington BLM lands in early July. That update will be included in the SSS database on the BLM intranet site at web.or.blm.gov/or930/sssdb. The list was developed by District and Resource Area personnel working with the State Office. Overall, 61 species were identified as additions as BS or BA to one or more District. The list will change as field units update species' documented and suspected status.

The ROD removing the S&M S&Gs does not change any of the BLM policy regarding SSS management. BLM policy states that BLM actions should not contribute towards federal listing of a species under the Endangered Species Act. To ensure this, BLM policies address project level evaluations and line officer responsibility. Project level evaluations are conducted to provide line officers the decision space to provide adequate conservation for a species and to meet policy requirements while implementing program activities.

Pre-project evaluations

Per policy the BLM must conduct pre-project evaluations for all actions and determine the relative impacts to BS and BA species. Conclusions regarding this determination are to be documented in the Environmental Assessment or other NEPA document. Tracking species are not addressed in any of the discussions below, since project evaluations and management are not required per policy for the Bureau Tracking category.

Examples of various types of pre-project evaluations include, but are not limited to the following:

- Evaluation of species-habitat associations and presence of suitable or potential habitat
- Review of existing survey records, inventories and spatial data
- Utilization of professional research, literature, and other technology transfer sources
- Use of expertise, both internal and external, that is based on documented, substantiated professional rationale.
- Pre-project field survey, monitoring, and inventory for species that are based on technically sound and logistically feasible methods

It is expected that field level biologists and botanists will utilize these above tools as appropriate in conducting their evaluation. Biologists and botanists should make recommendations to their line officer as to the appropriateness and need of each of these potential tools; the line officer should determine what level of effort is needed to make a supportable evaluation.

FSEIS Assumptions and implications

In the Final Supplemental Environmental Impact Statement (FSEIS) on the removal of the S&M S&Gs, assumptions were used regarding the most likely method for completing pre-project evaluations and site management for the former S&M species added to and managed under SSS Program Policies. The assumptions in the FSEIS as to how the former S&M species would be managed under SSSP were based on the Category in which the species was listed in S&M. Under S&M, species were placed in one of 6

different S&M Management Categories (A, B, C, D, E, and F) depending upon their relative rarity, whether surveys were considered practical or not, and whether enough information was known about the species to know the appropriate management needed. It is important to briefly understand these categories in order to understand the background behind some of the FSEIS assumptions. Table 1 summarizes management direction for species under the S&M S&Gs.

TABLE 1 **SUMMARY OF S&M SPECIES CATEGORIES**

Relative Rarity	**Pre-disturbance surveys practical**	**Pre-disturbance surveys not practical**	**Status undetermined**
Rare	**Category A** • Manage all known sites • Conduct pre-disturbance surveys	**Category B** • Manage all known sites • No pre-disturbance surveys required	**Category E** • Manage all known sites • Practicality of pre-disturbance surveys undetermined
Uncommon	**Category C** • Manage "high-priority" sites • Conduct pre-disturbance surveys	**Category D** • Manage "high-priority" sites • Pre-disturbance surveys not practical OR not required to provide a reasonable assurance of species persistence; no pre-disturbance surveys required	**Category F** • No site management • Practicality of pre-disturbance surveys undetermined

Field surveys

Field surveys most likely used as a tool

The following information is from page 6 of the ROD.

"If pre-disturbance surveys are practical under the Survey and Manage Standards and Guidelines, then clearance surveys, field clearances, field reconnaissance, inventories, and/or habitat examinations are most likely to be used for Special Status Species.

Field surveys are one likely tool to utilize for the former Survey and Manage species that were in Categories A or C, and 2 mollusk species in Category B. Survey protocols transmitted previously under the S&M Program for these species may be used for conducting field surveys, but are not required. Field managers will determine the need for field surveys, considering such items as species habitat associations, presence of suitable habitat, existing inventory data, and the likelihood that the project would cause an impact on the species should the species be present.

Field surveys not likely to be used as a tool
On page 6 of the ROD, there is further information about the assumptions used in the SEIS regarding field level surveys:

If pre-disturbance surveys are not practical under the Survey and Manage Standards and Guidelines (most Category B and D species) or a species status is undetermined (Categories E and F species), then field surveys are not likely to occur for Special Status Species either. Instead, the other components of pre-project clearances such as habitat examinations; habitat evaluation; evaluation of species-habitat associations and presence of suitable or potential habitat; review of existing survey records, inventories, and spatial data; or utilization of professional research, literature, and other technology transfer sources are most likely to be used."

Category B species in Survey and Manage were those species in which field surveys were considered impractical. Therefore, under SSSP, field surveys are likely not a tool for those former S&M species that were within Category B (except for two mollusk species mentioned above, and identified in Table 2).

Only one Category D species moves into the SSS Program, *Plethodon stormi* (the Siskiyou Mountain salamander). Surveys are feasible for this species. However surveys were determined under S&M to not be a necessary tool needed to provide for a reasonable assurance of species persistence, as enough sites for this species were previously located.

Unknown whether field surveys are a likely tool
The assumption used in the FSEIS was that species formerly in S&M Category E and F would not have field surveys conducted under SSSP. The standards for determining whether field surveys were necessary or feasible under S&M are much different than SSSP. Under S&M, a determination on the practicality of surveys was not made for Category E and F species. Instead, species were placed in these two Categories as not enough information was known about them in order to determine whether the S&M S&Gs were appropriate management direction for these species. Since SSSP uses different management direction and objectives than S&M, field surveys may or may not be a tool that field units utilize.

Summary
A species-specific summary table describing the assumptions for each of the 61 species added to BLM OR/WA SSS Program is located in Table 2.

Site management
Whether or how to protect a SSS site is dependent upon the site and project specific needs to meet BLM policy. Many variables come into play in making this determination. Per BLM OR/WA Instruction Memo OR-2003-054, conservation of a species may include but is not limited to: modifying a project (timing, placement, intensity, or dropping); using buffers to protect sites; and implementing habitat restoration actions (i.e., to benefit a species).

The FSEIS and ROD relied on some assumptions regarding the need to provide protection for known sites of former S&M species added to and now managed under SSS Program Policies. The following information comes directly from page 6 of the ROD, and is relevant to the NWFP area:

"The assumption used in the Final SEIS for managing known sites under the Special Status Species Programs was that sites needed to prevent a listing under the Endangered Species Act would be managed. For species currently included in Survey and Manage Categories A, B, and E (which require management of all known sites), it is anticipated that only in rare cases would a site not be needed to prevent a listing. For species currently included in Survey and Manage Categories C and D (which require management of only high-priority sites), it is anticipated that loss of some sites would not contribute to a need to list. Authority to disturb special status species sites lies with the agency official who is responsible for authorizing the proposed habitat-disturbing activity."

The FSEIS glossary (page 256) defines a known site as "Historic and current location of a species reported by a credible source, available to field offices, and that does not require additional species verification or survey by the Agency to locate the species…as well as sites located in the future."

Managing all known sites

Species formerly listed in Categories A, B, and E under Survey and Manage were considered to be "rare", with management under that Program requiring all known sites to be managed to provide for species conservation needs. Under the assumptions used in the FSEIS/ROD, species formerly in these 3 Categories were assumed to have all sites managed to meet SSS policy objectives. Line officers can make determinations on when sites are not needed, but according to the assumptions in the FSEIS and ROD, this is expected to be rare. These assumptions apply to both current and future found sites of these species.

Not managing all known sites

Former Category C and D species were determined to be "uncommon", with not all sites requiring protection everywhere in order to provide a reasonable assurance of species persistence. Local biologists and botanists will need to make recommendations as to which sites are likely needed or not to ensure consistency with BLM policy. Although the FSEIS/ROD does not mention the assumptions about site management for former S&M Category F species, under the S&M S&Gs these species received no site management.

In S&M, species were placed in Category D because "there are a sufficient number of sites known to meet species objectives". Additional sites were considered to not be needed and all currently known sites did not need protection. For BLM OR/WA, there is only one Bureau Sensitive or Assessment species in this category: *Plethodon stormi,* the Siskiyou Mountain salamander.

For BLM OR/WA, there is one former S&M Category F species that is now Bureau Sensitive: the fungi *Phaeocollybia olivacea* in Oregon.

Species specific summary
The following table summarizes field survey likelihood and site management assumptions for species moving from Survey and Manage to Bureau Sensitive or Assessment:

TABLE 2 **SURVEY AND SITE MANAGEMENT OF FORMER S&M SPECIES UNDER SSSP, AS ASSUMED UNDER THE 2004 ROD**					
	FIELD SURVEYS AS A TOOL FOR USE BY FIELD UNITS			**SITE MANAGEMENT UNDER SSSP FOR FORMER S&M SPECIES**	
TAXA, *species**	**Field surveys most likely used**	**Field surveys not likely to occur**	**Unknown if surveys are feasible/likely**	**All known sites likely managed**	**All known sites not likely managed**
Lichens					
Bryoria pseudocapillaris	X			X	
Bryoria spiralifera	X			X	
Bryoria subcana		X		X	
Calicium adspersum			X	X	
Heterodermia sitchensis			X	X	
Hypotrachyna revoluta			X	X	
Lobaria linita	X			X	

TAXA, *species*	Field surveys most likely used	Field surveys not likely to occur	Unknown if surveys are feasible/likely	All known sites likely managed	All known sites not likely managed
Lichens, cont.					
Microcalicium arenarium		X		X	
Niebla cephalota	X			X	
Pannaria rubiginosa			X	X	
Teloschistes flavicans	X			X	
Thorluna dissimilis		X		X	
Mollusks					
Cryptomastix devia	X			X	
*Deroceras hesperium***	X			X	
Fluminicola n. sp. 3	X			X	
Fluminicola n. sp. 11	X			X	
Lyogyrus n. sp. 1	X			X	
*Monadenia chaceana***	X			X	
Pristoloma arcticum crateris	X			X	
Bryophytes					
Diplophyllum plicatum		X		X	
Herbertus aduncus			X	X	
Iwatsukiella leuotricha		X		X	
Kurzia makinoana		X		X	
Marsupella emarginata var. aquatica		X		X	
Rhizomnium nudum		X		X	

TAXA, *species*	Field surveys most likely used	Field surveys not likely to occur	Unknown if surveys are feasible/likely	All known sites likely managed	All known sites not likely managed
Bryophytes, cont.					
Schistostega pennata	X			X	
Tetraphis geniculata	X			X	
Tritomaria exsectiformis		X		X	
Tritomaria quinquedentata		X		X	
Vascular Plants					
Bensoniella oregana	X			X	
Botrychium montanum	X			X	
Coptis trifolia	X			X	
Corydalis aquae-gelidae	X			X	
Cypripedium fasciculatum	X				X
Eucephalis vialis	X			X	
Vertebrates					
*Arborimus longicaudus silvicola****	X				X
Plethodon larselli	X			X	
Plethodon stormi	X				X
Fungi					
Albatrellus avellaneus		X		X	
Arcangeliella camphorata		X		X	
Boletus pulcherrimus		X		X	
Bridgeoporus nobilissimus	X			X	

TAXA, *species*	Field surveys most likely used	Field surveys not likely to occur	Unknown if surveys are feasible/likely	All known sites likely managed	All known sites not likely managed
Fungi, cont.					
Chroogomphus loculatus		X		X	
Dermocybe huboldtensis		X		X	
Destuntzia rubra		X		X	
Gastroboletus imbellus		X		X	
Gastroboletus vividus		X		X	
Gymnomyces nondistincta		X		X	
Macowanites mollis		X		X	
Martellia fragrans		X		X	
Martellia idahoensis		X		X	
Octavianina macrospora		X		X	
Phaeocollybia californica		X		X	
Phaeocollybia gregaria		X		X	
Phaeocollybia olivacea			X		X
Phaeocollybia oregonensis		X		X	
Ramaria spinulosa var. diminutiva		X		X	
Rhizopogon chamaleontinus		X		X	
Rhizopogon ellipsosporus		X		X	
Rhizopogon exiguus		X		X	
Thaxterogaster pavelekii		X		X	

*Not all of these species are documented or suspected on each of the Districts. Districts are required to only apply policy for those suspected or documented on their lands.

**Although these two mollusk species were Category B under S&M, "equivalent effort" surveys were directed to be conducted under the S&M S&Gs, and covered in species survey protocols.
***Located only in north Oregon coast range; portions of EUG and SAL

Potential questions to ask when evaluating a project
The following is just one tool field units can use when assessing if a proposed project may contribute to the need to list a species or not. This represents a simplistic assessment that could be conducted for a project and could be used for single species or species groups.

1. Is the proposed project within the range of the species? If yes, go to 3.
   If not, then project will not contribute to the need to list. Document.

2. Is the proposed project located within habitat of the species? If yes, go to 5.
   If not, then project will not contribute to the need to list. Document.

3. Will the proposed project negatively impact the species or species habitat? If yes, go to 7.
   If not, then project will not contribute to the need to list. Document.

4. Is the negative impact to the species/habitat detrimental to overall conservation needs of the species? (Need to look at the larger scale when addressing this. Utilize resources available to you such as habitat associations, number and distribution of sites, other expertise, and surveys (if feasible) to determine likelihood of species presence and degree of project impact). If yes, go to 9.
   If not, then project will not contribute to the need to list. Document.

5. Can the site/habitat be protected, or the project modified to eliminate or reduce the impact such that the impact is no longer detrimental to overall conservation needs? If not, then go to 11.
   If yes, then project will not contribute to the need to list. Document.

6. If project design for site protection is infeasible, consult with line officer and appropriate State Office Special Status Species Program Manager.

Additional tools to assist field units in performing project level evaluations are forthcoming.